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District of Nevada
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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CHRISTOPHER ALLEN DISNEY,

Plaintiff,

v.

ANDEW SAUL,
Commissioner of Social Security,

Defendant.

Case No. 2:18-cv-01648-GMN-CWH

**JOINT STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME TO FILE
CROSS-MOTION TO AFFIRM AND/OR
RESPOND TO PLAINTIFF'S MOTION FOR
REMAND.
(Second Request)**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Remand be extended from July 19, 2019 to July 26, 2019. This is Defendant's second request for extension. Good cause exists to grant Defendant's request for extension. Counsel for Defendant was out of the office since the last extension request due to ongoing health issues from her chronic migraines, which impair her vision. In addition, Counsel also has over 100+ active social security matters, which require two or more dispositive motions until mid-September. Counsel also has three pending Ninth Circuit matters, which require several levels of review. As such, Counsel needs additional time to adequately review the transcript and properly

1 respond to Plaintiff's Motion for Summary Judgment. The parties further stipulate that the Court's
2 Scheduling Order shall be modified accordingly. Defendant makes this request in good faith with no
3 intention to unduly delay the proceedings. Counsel apologizes for the belated request, but made her
4 request as soon as reasonably practicable following her leave.

5 Respectfully submitted,

6 Respectfully submitted,

7 Dated: July 19, 2019

8 /s/ John Shook
9 (*as authorized by email on July 19, 2019)
10 JOHN SHOOK
11 Attorney for Plaintiff

12 Dated: July 19, 2019

13 NICHOLAS A. TRUTANICH
14 United States Attorney
15 DEBORAH LEE STACHEL
16 Regional Chief Counsel, Region IX
17 Social Security Administration

18 By /s/ Tina L. Naicker
19 TINA L. NAICKER
20 Special Assistant U.S. Attorney
21 Attorneys for Defendant

22 **ORDER**

23 APPROVED AND SO ORDERED:

24 DATED: July 23, 2019
25 _____

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THE HONORABLE CARL W. HOFFMAN
UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 I, TINA L. NAICKER, certify that the following individual was served with a copy of the
3 **JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO FILE**
4 **CROSS-MOTION TO AFFIRM AND RESPOND TO PLAINTIFF'S MOTION FOR REMAND**
5 on the date and via the method of service identified below:

6 **CM/ECF:**

7
8 John B. Shook
9 Shook & Stone, Chtd.
10 710 S. Fourth St.
11 Las Vegas, NV 89101
12 (702) 385-2220
13 Fax: (702) 384-0394
14 Email: johnshook@shookandstone.com

15 Attorneys for Plaintiff

16 Respectfully submitted this 19th day of July 2019,

17 /s/ Tina L. Naicker
18 TINA L. NAICKER
19 Special Assistant United States Attorney
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